



TRI-COUNTY TELEPHONE  
ASSOCIATION, INC.

P.O. Box 299  
1568 S. 1000 Rd.  
Council Grove, KS 66846-0299  
620-767-5153  
FAX (785) 366-7007  
(Toll Free) 1-800-362-2576  
www.tctelco.net

## Certification of CPNI Filing February 2, 2006

February 2, 2006

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of Secretary  
445 12th Street, SW  
Washington, D.C. 20554

Re: EB-06-TC-060

Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 30, 2006, *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, (DA-06-223).

As directed, a copy of this report has been sent to Bryon McCoy of the Commission's Enforcement Bureau, Telecommunications Consumers Division.

All inquiries in connection with this filing should be addressed to our office.

Respectfully submitted,

Dale L. Jones

CEO

The Tri-County Telephone Association, Inc.

Enclosures

cc: Bryon McCoy, Telecommunications Consumers Division

### OFFICERS

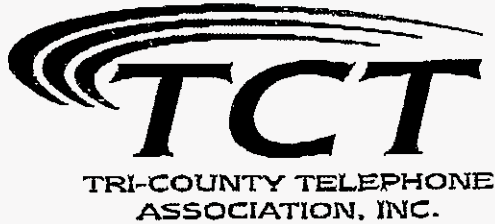
Keith A. Diekmann, President  
Marvin L. Tischhauser, Vice President  
Mark L. Riedy, Treasurer  
William A. Kassebaum, Secretary

### DIRECTORS

G. Dean Miller  
Leland A. Parker  
Kent E. Rock  
Anita M. Hummel  
Dan. D. Reiff

### CEO

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September 15, 2005

**ANNUAL CERTIFICATION LETTER- Customer Proprietary Network  
Information Procedures of The Tri-County Telephone Association, Inc.**

I, Dale Jones, Herby certify that I have personal knowledge that The Tri-County Telephone Association, Inc. has established an operating procedure regarding the Customer Proprietary Network Information generated by the customers of The Tri-County Telephone Association, Inc. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR 64.2001-64.2009.

Signed: 

By: Dale Jones, CEO  
The Tri-County Telephone Association, Inc.

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**CEO**

Dale L. Jones

## **Certification of CPNI Filing February 2, 2006**

### **The Tri-County Telephone Association, Inc.**

The Tri-County Telephone Association, Inc. hereby submits that its procedures regarding its customers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

The Tri-County Telephone Association, Inc. uses its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009. It has provided proper, individual notice to each of its customers and, dependent on use, given its customers the required regulatory time period to either allow usage of CPNI or disallow CPNI usage. Further, on all in-bound calls, customers are given notice that their CPNI may be used and given the opportunity to allow or disallow CPNI usage for the duration of that call.

The Tri-County Telephone Association, Inc.'s employees, including marketing and sales personnel and customer service representatives, have been educated about CPNI, federal regulations and The Tri-County Telephone Association, Inc.'s statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal.

Employees may easily determine the CPNI status of individual customers prior to using CPNI. The Tri-County Telephone Association, Inc. maintains a written log regarding outbound usage of CPNI including a description of the marketing activity, which products and/or services were marketed and the specific CPNI used. All sales and marketing personnel obtain approval from his/her supervisor of any outbound usage of CPNI. The Tri-County Telephone Association, Inc. currently does not sell, rent or otherwise disclose customers' CPNI to non-affiliated entities. If The Tri-County Telephone Association, Inc.'s affiliates are allowed to access customers' CPNI, then such disclosure is noted in the written log.

In compliance with the Commission's rules, The Tri-County Telephone Association, Inc. does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.